

December 13, 1999

Ms. Sherry Giarusso-Mulhearn, Executive Director  
Rhode Island Resource Recovery Corporation (RIRRC)  
65 Shun Pike  
Johnston, RI 02909

**RE: Final Capping Schedule for Phases II and III – Central Landfill**

Dear Ms. Giarusso-Mulhearn:

It is our understanding that RIRRC is approaching the final capacity limits for Phases II and III of the Central Landfill. Based upon recent projections, those limits will be reached in April, 2000. This letter is to serve as a reminder of the closure-related requirements of the Department's Solid Waste Regulations. Specifically, Rule 2.3.04(c)(3) requires that closure begin within thirty (30) days of final receipt of waste in these phases, and Rule 2.3.04(c)(4) requires completion of closure within one-hundred eighty (180) days from commencement of closure activities.

The on-going struggle to deal with odor control problems at the landfill should leave no doubt about the importance of full and timely compliance with these regulatory requirements, i.e. completion of capping activities by late fall, 2000. While the Department appreciates efforts by RIRRC in the field to temporarily address the odor problem, the limited success of these efforts underscores that the permanent solution is placement of the final cap with all necessary controls for gas collection and treatment over these areas. The Department takes the position that this final solution should be implemented as soon as possible.

Submission of the cap design plans was discussed at a meeting between Office of Waste Management (OWM) staff and your consultants as long ago as 8 October 1998. To date, however, we have not received any final capping construction documents to review and approve. In light of the on-going community complaints about odor impacts and the approaching regulatory deadlines, further delay is not acceptable. Final capping construction drawings must be submitted to the Department no later than January 7, 2000. This initial submission deadline is intended to allow ample time for technical review by my staff and, if necessary, modifications to the plans prior to approval.

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The submitted plans must include all recently constructed, as well as proposed gas collection improvements. The plans must also address the results of the gas evaluation report the Department expects to receive from your consultant, GZA Geoenvironmental, Inc., by December 31, 1999. Please note that the Department's review will focus in particular on the proposed capping measures to be implemented in that area where Phase IV filling will overlap Phase III. It is critical that the measures proposed in this area ensure that adequate gas collection rates will be achieved.

If you have any questions regarding these requirements, please do not hesitate to contact me or my staff at 222-2771.

Sincerely,

Jan Reitsma  
Director

cc: Edward Szymanski, Associate Director – DEM  
Terrence Gray, Assistant Director – DEM  
Leo Hellested, Chief – DEM/OWM  
Steve Majkut, Chief – DEM/OAR